



BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

**FILED**

10-03-07  
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In the Matter of the Application of  
PACIFIC GAS AND ELECTRIC  
COMPANY (U 39-e) for Approval of  
2008-2020 Air Conditioning Direct Load  
Control Program.

Application 07-04-009

**MOTION OF THE DIVISION OF RATEPAYER ADVOCATES  
FOR HEARINGS**

The Division of Ratepayer Advocates (DRA) hereby moves for hearings in Application 07-04-009, Pacific Gas & Electric's (PG&E) Application for its Air Conditioning (AC) Direct Load Control Program. DRA is still determining which of PG&E's witnesses will be needed for cross-examination, and does not, at this time, have specified time estimates. However, DRA anticipates that one to two days would be a sufficient timeframe to complete its questioning at hearings.

On October 1, 2007, PG&E served its rebuttal testimony. Based on review of the rebuttal testimony, DRA believes important questions remain regarding PG&E's proposed budget request of approximately \$362 million for PG&E's 2008-2020 AC Program, including:

-- Implementation of the AC Program, including, but not limited to: marketing, technology selection, and incentive levels;

-- PG&E's forecast and projections for the proposed budget, including, but not limited to, assumptions regarding customer technology preference and the need for risk based allowance;

-- Feasibility of the AC program structure and mechanics, including, but not limited to, program length, cost recovery of the installation phase and the operations and maintenance phase.

DRA asks that the Commission grant its request for hearings to cross-examine PG&E's witnesses on these and potentially other topics raised by PG&E's rebuttal testimony. In addition, DRA requests cross-examination, if necessary, on topics raised by PG&E's opening testimony, to determine the reasonableness of PG&E's proposed budget request. TURN does not oppose DRA's motion.

Respectfully submitted,

/s/ LISA-MARIE SALVACION

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October 3, 2007

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a copy of “**MOTION OF THE DIVISION OF RATEPAYER ADVOCATES FOR HEARINGS**” in **Application 07-04-009** by using the following service:

[ x ] **E-Mail Service:** sending the entire document as an attachment to all known parties of record who provided electronic mail addresses.

[ ] **U.S. Mail Service:** mailing by first-class mail with postage prepaid to all known parties of record who did not provide electronic mail addresses.

Executed on October 3, 2007 at San Francisco, California.

/s/ JOANNE LARK

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Joanne Lark

**N O T I C E**

Parties should notify the Process Office, Public Utilities Commission, 505 Van Ness Avenue, Room 2000, San Francisco, CA 94102, of any change of address and/or e-mail address to insure that they continue to receive documents. You must indicate the proceeding number on the service list on which your name appears.

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